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15 **UNITED STATES DISTRICT COURT**
16 **CENTRAL DISTRICT OF CALIFORNIA**

17 **ANDREA LOVE**, an individual,

18 Plaintiff,

19 vs.

20 **ELLEN STONE**, an individual; and DOES 1
21 through 25, inclusive

22 Defendants.

Case No.: 2:23-cv-3122

**PLAINTIFF ANDREA LOVE'S
DECLARATION IN SUPPORT OF
NOTICE OF MOTION AND MOTION TO
REMAND REMOVED ACTION**

(28 U.S.C.S. §1447(c))

Complaint Filed: 2.28.2023
LASC Case No.: 23STCV04399

1 1. I, Andrea Love, declare that: I am the Plaintiff of record in the above-entitled
2 action. I was the personal assistant of Defendant Ellen Stone (“Defendant”) for over six years
3 prior to the commencement of this action. If called upon to testify, I could and would
4 competently testify as to the facts stated herein based upon my own personal knowledge.

5 2. Defendant moved to Los Angeles, California in 2016 to be closer to her daughters
6 and to join the D.A.R.E. community, as per her own handwritten journal and comments made to
7 me, which is explicitly written in her own handwriting in her journal which is in the first
8 paragraph of the holographic note submitted herein as evidence. Defendant would routinely have
9 me transcribe journal notes for her over the years and this was one of them.

10 3. Defendant had her bank statements sent to her residence in Los Angeles for years.

11 4. Defendant signed up for an out of state driver’s license renewal program which is
12 only reserved for students or military and took her driving test at the Los Angeles Department of
13 Motor Vehicles located at 1909 Kinross Avenue Los Angeles, CA 90024.

14 5. Defendant has maintained a façade that she has ties to Chicago to avoid paying
15 California taxes as she had on at least one occasion explicitly told me so and as revealed by her
16 schemes such as where she pressured employees to declare that they were fired or needed to
17 collect COVID pay and paid them in checks made out to cash.

18 6. Defendant has lived in Los Angeles continuously through the date of the filing of
19 this lawsuit (she resided in Los Angeles for over 95% of the time for years including through the
20 filing date of this complaint), and, for example Defendant was served with the instant complaint
21 in person at her Los Angeles home and had a pest control appointment that she personally
22 coordinated about a week before the instant complaint was filed.

23 7. Defendant is a Block Captain with the Los Angeles Miracle Mile Residential
24 Association (“MMRA”) which requires her to oversee 100 people, work with local police, and
25 crucially in order to join as a block captain for the MMRA she represented to that committee that
26 “her primary residence is within the boundaries of the MMRA Wilshire Boulevard on the north;
27 San Vicente Blvd., on the south; La Brea Avenue on the east; and Fairfax Avenue on the west” as
28 per the MMRA website.

8. I have in my possession flight records that disclose the entire amount of time to my knowledge that Defendant was in Chicago during my time of employment with her which was for a total of 74 days over the course of six years and two months. I hereby reinforce that my testimony under oath is that Defendant Ellen Stone was not in Illinois for more than 74 days to my knowledge in the over six years I had worked for her. Specifically, I declare that from June 2016 through September 26, 2022, I was the person that drove Defendant to the airport. From June 2016 to September 2022 Defendant only went to Chicago from October 10-15, 2016 (American Airlines Record Locator: YEVSCE); and February 28 – March 7 2019 (American Airlines Record Locator: OPSSSQ)); May 27 – June 2, 2019 (7 days) and July 23 – September 14, 2021 (54 days) (American Airlines Record Locator: QQVIRN) Defendant has lived in Los Angeles continuously through the date of the filing of this lawsuit (Defendant was physically present in Los Angeles for over 90% of the time for many years including through the filing date of this complaint).

9. Defendant elected to have numerous surgeries in Los Angeles over the years.

10. Defendant uses many doctors in Los Angeles that Defendant has seen over the years, which was coordinated by me.

11. Due to my position as Defendant's personal assistant, I have copious records to demonstrate that Defendant lived in Los Angeles continuously for the better part of a decade (aside from my testimony as to the same) and during my term of employment with her, and among those items are the following which I submit to this Court for consideration:

- **Exhibit A:** Handwritten note from Defendant's journal describing move to LA
- **Exhibit B:** List of Block Captains for Defendant's neighborhood in LA identifying Defendant as a "block captain"
- **Exhibit C:** List of Defendant's healthcare providers over the past 8 years
- **Exhibit D:** Signed lease for a property Defendant maintained in Santa Monica
- **Exhibit E:** Lease for beachfront/Pacific Coast property in Los Angeles, through July 5, 2023
- **Exhibit F:** Investment Letter addressed to Defendant in Los Angeles

- 1 • **Exhibit G:** Lease Extensions for Defendant's Los Angeles property
- 2 • **Exhibit H:** Receipt for Defendant's driver's license test taken in Los Angeles
- 3 • **Exhibit I:** Redacted documents pertaining to Defendant's various surgical procedures
- 4 performed in Los Angeles
- 5 • **Exhibit J:** Los Angeles Vet records for Defendant's dog
- 6 • **Exhibit K:** Documents pertaining to Los Angeles smog checks performed on
- 7 Defendant's car
- 8 • **Exhibit L:** Screen shot of a text message exchange which reveals that Defendant was
- 9 home for a pest control service eight days before filing complaint

10 I declare under penalty of perjury under the laws of the State of California that the foregoing is
11 true and correct. Executed this 3rd day of July 2023, in Los Angeles, California.

12 */s/ Andrea Love*

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Andrea Love

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